

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH LACZA,

Plaintiff,

v.

BOOST ENTERPRISES, INC.,

Defendant.

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Case No. 1:18-CV-07910

Honorable Judge John Robert Blakey

MOTION TO WITHDRAW

The law firm of Bruning & Associates, P.C., as attorney of record for JOSEPH LACZA, in support of its Motion to Withdraw as attorney of record for JOSEPH LACZA states as follows:

1. Bruning & Associates, P.C. is counsel of record for the Plaintiff, Joseph Lacza (“Lacza”) in this matter.

2. Lacza originally retained John Busch of the J. Busch Law Group, LLC. In April of 2020, Attorney John Busch moved to the law firm of Bruning & Associates, P.C.. Thereafter, J. Busch Law Group LLC permanently closed.

3. Lacza retained Attorney John Busch of Bruning & Associates, P.C. to continue representing Lacza in this case, and promised to pay to Bruning & Associates, P.C. various sums as attorney’s fees and for expenses incurred in this matter.

4. Lacza has refused and failed, and continues to refuse and fail to pay amounts due and owing to Bruning & Associates, P.C. for attorney’s fees and expenses incurred on behalf of Lacza in this case.

5. Irreconcilable differences have arisen between Lacza and Bruning & Associates, P.C.

6. Bruning & Associates, P.C. is entitled to withdraw as counsel for Lacza for non-payment of fees and expenses.

7. Lacza should be granted an extension of 21 days within which to obtain substitute counsel or otherwise appear in the case.

WHEREFORE, the law firm of Bruning & Associates, P.C. respectfully requests this Court grant the following relief:

- a. An order permitting Bruning & Associates, P.C. to withdraw as counsel for Lacza;
- b. An order permitting Lacza 21 days to obtain substitute counsel and/or otherwise file an appearance in this case;
- c. For any other relief as this Court deems just and appropriate.

Respectfully submitted
JOSEPH LACZA, Plaintiff

By: /s/ John A. Busch
One of its Attorneys

John A. Busch, ARDC #6199355
Bruning & Associates, P.C.
2 N. Riverside Plaza Suite 1830
Chicago, IL 60606
(312) 953-7095
jbusch@bruninglaw.com